



## STATE OF ALABAMA

ALABAMA PUBLIC SERVICE COMMISSION

P. O. BOX 304260

MONTGOMERY, ALABAMA 36130-4260

September 16, 2014

TWINKLE ANDRESS CAVANAUGH, PRESIDENT

JEREMY H. ODEN, ASSOCIATE COMMISSIONER

TERRY DUNN, ASSOCIATE COMMISSIONER

JOHN A. GARNER, EXECUTIVE DIRECTOR

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Received & Inspected

SEP 18 2014

FCC Mail Room

USAC

Vice President, High Cost and Low Income Division  
2000 L Street NW, Suite 200  
Washington, DC 20036

Re: CC Docket No. 96-45/WC Docket No. 14-58, Annual State Certification of Support For Eligible Telecommunications Carriers Pursuant to 47 C.F.R. § 54.314

Pursuant to the requirements of 47 C.F.R. § 54.314, the Alabama Public Service Commission (APSC) hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company (USAC) that the telecommunications carriers included in Attachment "A" of this letter are eligible to receive federal high cost-support for the years cited.

The representations and certifications herein provided are largely the product of informal proceedings conducted before the APSC in Docket 25980. A copy of the APSC's Order approving and certifying the proposals of AT&T, CenturyLink, Alabama's Rural Carriers, and Alabama's non-incumbent LEC Eligible Telecommunications Carriers regarding their intended utilization of the federal high-cost universal service support for which they are eligible in the year 2015 is enclosed herein.

The Alabama Public Service Commission certifies for the carriers listed in Attachment "A" that all federal high-cost support provided to such carriers within Alabama was used in the preceding year (2013) and will be used in the coming calendar year (2015) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

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The APSC thanks the Commission and USAC for its diligence and cooperation in this matter. Please date stamp the extra copy of this filing and return it to the APSC in the enclosed, stamped, self-addressed envelope.


ALABAMA PUBLIC SERVICE COMMISSION



Twinkle Andress Cavanaugh, President



Jeremy H. Oden, Commissioner



Terry L. Dunn, Commissioner

## ATTACHMENT "A"

### ALABAMA PUBLIC SERVICE COMMISSION

CERTIFIED TELECOMMUNICATIONS CARRIERS ELIGIBLE TO RECEIVE  
FEDERAL HIGH COST SUPPORT FOR THE CALENDAR YEAR 2015

COMPANY NAME AND STUDY AREA CODE (SAC)

COMPANY	SAC
ARDMORE TELEPHONE COMPANY, INC.	290280
BLOUNTSVILLE TEL CO	250282
BRINDLEE MOUNTAIN	250283
BUTLER TEL CO	250284
CASTLEBERRY TEL CO	250285
NATIONAL OF ALABAMA	250286
FARMERS TELECOM COOP	250290
KNOLOGY OF THE VALLEY, INC.	220371
KNOLOGY TOTAL COMMUNICATIONS, INC.	250295
GTC, INC	210291
GULF TEL CO - AL	250298
HAYNEVILLE TEL CO	250299
HOPPER TELECOMM. CO.	250300
FRONTIER-LAMAR CNTY	250301
WINDSTREAM AL	250302
MILLRY TEL CO	250304
MON-CRE TEL COOP	250305
FRONTIER COMM.-AL	250306
MOUNDVILLE TEL CO	250307
NEW HOPE TEL COOP	250308
OAKMAN TEL CO (TDS)	250311
OTELCO TELEPHONE LLC	250312
PEOPLES TEL CO	250314
PINE BELT TEL CO	250315
RAGLAND TEL CO	250316
ROANOKE TEL CO	250317
FRONTIER COMM-SOUTH	250318
UNION SPRINGS TEL CO	250322
VALLEY TELEPHONE COMPANY, INC.	220324
BELLSOUTH TELECOMMUNICATIONS, LLC	255181
HAYNEVILLE FIBER TRANSPORT, INC.	259008
BUDGET PHONE, INC.	259009
NEXUS COMMUNICATIONS, INC	259909
TROY CABLEVISION, INC.	259025
CENTURYTEL OF ALABAMA. LLC	
CENTURYTEL-AL-SOUTH	259788
CENTURYTEL-AL-NORTH	259789





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MONTGOMERY, ALABAMA 36130-4260

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TWINKLE ANDRESS CAVANAUGH, PRESIDENT

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TERRY DUNN, ASSOCIATE COMMISSIONER

JOHN A. GARNER, EXECUTIVE DIRECTOR

**IN RE: IMPLEMENTATION OF THE UNIVERSAL  
SERVICE REQUIREMENTS OF SECTION 254 OF  
THE TELECOMMUNICATIONS ACT OF 1996  
AND 47 C.F.R § 54.314**

**DOCKET 25980**

**(CERTIFICATION OF CARRIERS  
RECEIVING FEDERAL UNIVERSAL  
SERVICE FUND HIGH COST SUPPORT  
FOR 2015)**

**FURTHER REPORT AND ORDER**

**BY THE COMMISSION:**

**I. Introduction and Background**

By Order entered in this cause on December 12, 2013, Eligible Telecommunications Carriers ("ETCs") in Alabama, that are subject to Commission jurisdiction, were ordered to file their proposals for utilization of projected 2015 federal, high-cost, universal service support (the "2015 high-cost support") by no later than May 5, 2014. The Commission's Order afforded interested parties the latitude to submit comments in response to those filings no later than May 26, 2014, with any reply comments due on or before June 16, 2014.

By filing dated August 8, 2014, BellSouth Telecommunications, LLC, d/b/a AT&T Alabama ("AT&T") submitted their proposal for utilization of the anticipated 2015 high-cost support. By filing dated August 8, 2014, CenturyTel of Alabama, LLC, d/b/a CenturyLink ("CenturyLink") submitted a proposal for utilizing the projected 2015 high-cost support. On various dates in 2014, the Rural Carriers (the "Rural LECs") identified individually in Appendix "A" hereto, and other Alabama ETCs submitted certifications regarding their planned utilization of 2015 high-cost support.

## **II. AT&T's Planned Utilization of 2015 High-Cost Support**

AT&T anticipates \$23.60 million in 2015 high-cost support and submitted its proposal for utilization of the funds during 2015, which is attached hereto as Appendix B and summarized as follows:

### **Broadband deployment and maintenance in substantially unserved areas – 23.6M**

As a result of the FCC's revisions to the USF program in 2011, recipients are required to use all 2015 USF funding to provide broadband in substantially unserved areas. AT&T Alabama will determine the census blocks in our service area which meet these criteria and use these funds to expand and maintain broadband availability in these areas. Examples of the use of these funds include the placement of new IP based equipment, placement of new fiber facilities in the local loop, upgrading inter-office facilities to expand capacity, additional central office based equipment, and other support infrastructure expenditures needed to support this additional broadband deployment. No comments opposing AT&T's proposal were submitted.

Staff recommends that AT&T be required to submit to the Commission, within thirty (30) days of the close of each calendar quarter, a report delineating the status of each project approved herein and the level of funding expended on said projects. Staff recommends further that AT&T be required to meet with the staff, in person or via conference call, on any mutually agreeable day during March 2015, for purposes of discussing the Company's 2015 capital budgets with respect to USF wire centers and census blocks. Subject to the reporting and disclosure requirements discussed in the foregoing, staff recommends approval of AT&T's 2015 high-cost support proposal.

## **III. CenturyLink's Planned Utilization of 2015 High-Cost Support**

CenturyLink anticipates \$15.00 million in 2015 high-cost support. CenturyLink's planned utilization of the 2015 high-cost support, which is attached hereto as Appendix C, is summarized follows:

### **Network operation and improvements -\$ 15.0M**

Network operation and improvements include expenditures and investments such as: enhancing network reliability by placing diverse fiber routes, fiber to existing remotes, adding permanent generators, replacing central office power equipment, replacing select obsolete equipment, placement of next generation technology (digital loop carriers, ethernet, fiber to the premise), replacement of air core and paper insulated cable, adjusting relays, network monitoring, maintaining batteries, repair and replacement of minor materials, restoration of plant damaged by casualties, testing equipment, and vehicle maintenance which enables the company to improve service, continue quality service, and promote availability of advanced services. Investments and expenses may include extension of fiber, deployment and maintenance of broadband capable equipment, and enabling broadband service in areas substantially unserved by an unsubsidized carrier.

Staff recommends that CenturyLink be required to submit to the Commission within thirty (30) days of the close of each calendar quarter, a report delineating the status of each project approved herein and the level of funding expended on said projects. Staff recommends further that CenturyLink be required to meet with the staff, in person or via conference call, on any mutually agreeable day during March 2015, for purposes of discussing the Company's 2015 capital budgets with respect to USF wire centers and census blocks. Subject to the reporting and disclosure requirements discussed in the foregoing, staff recommends approval of CenturyLink 2015 high-cost proposal.

#### **IV. Filings of the Rural Carriers**

With regard to the Rural Carriers listed in Appendix "A" hereto, the Commission determined in its Order for this docket dated December 20, 2001, that the Commission could best meet its universal service monitoring and certification obligations for each Rural LEC "cost company" by requiring such companies to file with the Commission by January 15 of each year a copy of their supporting annual interstate cost separation studies, their annual USF-High-Cost loop support filings, and their estimated USF-local switching support filings that are made with the Universal Service Administrative Company ("USAC") and the National Exchange Carriers Association ("NECA"). With respect to the Rural LECs that are "average schedule" companies, the Commission required such companies to file for review by January 15 of each year a copy of



USAC's and NECA's proposed annual USF-High-Cost loop support and USF-local switching support amounts.

The certifications submitted by the Rural LECs listed in Appendix "A" hereto throughout 2014 and attached hereto as Appendix "D" reflect that each of those Rural LECs will in 2015 continue to utilize the high-cost universal service funding they receive in a manner compliant with the requirements of §254 of the Telecommunications Act of 1996. The Commission will continue to verify the certifications of the aforementioned Rural LECs through the filings they make with the Commission each year. Staff accordingly recommends approval of the 2015 high-cost expenditures of the Rural LECs.

#### **V. The Expenditures of the Remaining High-cost ETCs**

The remaining Alabama ETCs that are certified for high-cost purposes include Hayneville Fiber Transport, Inc., d/b/a Camellia Communications, Inc. ("Camellia"); Budget PrePay, Inc. ("Budget"); Nexus Communications Inc., d/b/a TSI Nexus, Inc. ("TSI Nexus"); and Troy Cablevision, Inc. ("Troy Cablevision") (collectively the "non-incumbent local exchange carrier ETCs"). Each affirms to the Commission their continued eligibility for USF high-cost support and certifies to use the 2015 federal high-cost support in accordance with §254(e) of the Act. The Commission's investigation of the aforementioned ETCs indicates that those entities have and will continue to expend any and all federal high-cost funding received in a manner consistent with §254(e) as they have certified in the documents attached hereto as Appendix "E." Staff accordingly recommends approval of the 2015 high-cost expenditure plans of the non-Incumbent Local Exchange Carrier ETCs.

#### **VI. Discussion and Conclusions**

We hereby approve the proposals submitted in this cause by AT&T, CenturyLink, Alabama's Rural Carriers and the non-Incumbent Local Exchange Carrier ETCs governing their expenditure of federal high-cost universal service support during the year 2015. We will certify to the FCC that those plans are compliant with the provisions of §254(e) of the Telecommunications Act of 1996 and 47 C.F.R. 54.314.

We specifically note, however, that our approval herein is contingent upon the staff's continued monitoring of the implementation of the aforementioned plans. The Commission specifically reserves the right to conduct any proceedings that may be necessary to determine if the funding under review should be redirected to other qualifying projects as required by the Commission.

In accordance with 47 C.F.R. §54.313, any recipient of high-cost support shall file reports which includes their Five-Year Service Quality Improvement Plan; Outage Report; Requests for Service; Complaints per 1000 Connections; Certifications; Current Price Offerings; Company Identification; Tribal Outreach; Annual Financial Report; Areas with No Terrestrial Backhaul; and Additional Voice Rate Data with the FCC. This information is to be submitted with their 2015 USF high-cost filing by July 1, 2015. This data shall be submitted to the Commission's Utility Services Division.

IT IS, THEREFORE, ORDERED BY THE COMMISSION, That the August 8, 2014, proposal of BellSouth Telecommunications, LLC, d/b/a AT&T Alabama (Study Area Code ("SAC) 255181) attached hereto as Appendix "B" and delineating the Company's intended utilization of the federal high-cost universal service support for which it is eligible during the year 2015 is hereby approved as stipulated herein and certified as compliant with the provisions of §254(e) of the Telecommunications Act of 1996 and 47 C.F.R. 54.314. The approval granted herein is, however, contingent on BellSouth Telecommunications, Inc., d/b/a AT&T Alabama's compliance with all provisions of this order including the timely submission of the information requested herein.

IT IS FURTHER ORDERED BY THE COMMISSION, That the August 8, 2014, proposal of CenturyTel of Alabama, LLC, d/b/a CenturyLink (SAC's 259788 and 259789) attached hereto as Appendix "C" and delineating the Company's intended utilization of the forward-looking federal high-cost universal service support for which it is eligible during 2015 is hereby approved as stipulated herein and certified as compliant with the provisions of §254(e) of the Telecommunications Act of 1996 and 47 C.F.R. 54.314. The approval granted herein is, however, contingent on CenturyLink's compliance with all provisions of this order including the timely submission of the information requested herein.

IT IS FURTHER ORDERED BY THE COMMISSION, That pursuant to 47 C.F.R. §54.313, any recipient of high-cost support shall file reports which includes their Five-Year



Service Quality Improvement Plan; Outage Report; Requests for Service; Complaints per 1000 Connections; Certifications; Current Price Offerings; Company Identification; Tribal Outreach; Annual Financial Report; Areas with No Terrestrial Backhaul; and Additional Voice Rate Data with the FCC. This information is to be submitted with their 2015 USF high-cost filing by July 1, 2015. This data should also be submitted to the Commission's Utility Services Division.

IT IS FURTHER ORDERED BY THE COMMISSION, That the proposals/statements of Alabama's Rural Carriers collectively attached hereto as Appendix "D" are hereby approved and certified as compliant with the provisions of §254(e) of the Telecommunications Act of 1996 and 47 C.F.R. 54.314.

IT IS FURTHER ORDERED BY THE COMMISSION, That the anticipated expenditures of all federal high-cost support received by Hayneville Fiber Transport, Inc., d/b/a Camellia Communications (SAC 259008); Budget PrePay, Inc.(SAC 259009); Nexus Communications Inc., d/b/a TSI Nexus, Inc.(SAC 259909); and Troy Cablevision, Inc.(SAC 259025) are hereby certified as compliant with the provisions of §254(e) of the Telecommunications Act of 1996 and 47 C.F.R. 54.314 based on the certifications contained in Appendix "E."

IT IS FURTHER ORDERED BY THE COMMISSION, That the approval and certifications addressed herein shall be further contingent upon satisfactory results from the Commission's ongoing review of the project specific expenditures of AT&T, CenturyLink, Alabama's Rural Carriers, and the remaining high-cost non-Incumbent Local Exchange Carrier ETCs as designated by the Commission. The Commission specifically reserves the right to conduct whatever proceedings may be deemed necessary to determine that the universal service funding received by AT&T, CenturyLink, Alabama's Rural Carriers, and all remaining non-Incumbent Local Exchange Carrier ETCs in Alabama should be redirected by the Commission to other qualifying projects. To that end, AT&T and CenturyLink shall submit to the Commission within thirty (30) days of the close of each calendar quarter, a report delineating the status of each project approved herein and the level of funding expended on said projects. The Rural LECs shall continue to comply with the reporting requirements established in the Commission's December 20, 2001, Order entered in this cause unless and/or until otherwise directed by the Commission.

IT IS FURTHER ORDERED BY THE COMMISSION, That AT&T, CenturyLink, Alabama's Rural Carriers, and all other ETCs in Alabama as designated by the Commission shall file their proposals for the utilization of the federal high-cost universal service support for which they are eligible in the year 2016 no later than July 1, 2015. Interested parties may submit comments in response to the foregoing filings no later than July 21, 2015. Reply comments will be considered by the Commission if received on or before July 31, 2015.

IT IS FURTHER ORDERED BY THE COMMISSION, That jurisdiction in this cause is hereby retained for the issuance of any further order or orders as may appear to be just and reasonable in the premises.

IT IS FURTHER ORDERED, That this Order shall be effective as of the date hereof.

DATED at Montgomery, Alabama, this 9th day of September, 2014.

ALABAMA PUBLIC SERVICE COMMISSION



Twinkle Andress Cavanaugh, President



Jeremy H. Oden, Commissioner



Terry L. Dunn, Commissioner

ATTEST: A True Copy



Walter L. Thomas, Jr., Secretary

**APPENDIX "A"**

Ardmore Telephone Company, Inc. (290280)  
Blountsville Telephone Company, Inc. (250282)  
Brindlee Mountain Telephone Company (250283)  
Butler Telephone Company, Inc. (250284)  
Castleberry Telephone Company, Inc. (250285)  
Farmers Telephone Cooperative, Inc. (250290)  
Frontier Communications of Alabama, LLC (250306)  
Frontier Communications of Lamar County, LLC (250301)  
Frontier Communications of the South, LLC (250318)  
GTC, Inc., d/b/a Fairpoint Communications (210291)  
Gulf Telephone Company (250298)  
Hayneville Telephone Company, Inc. (250299)  
Hopper Telecommunications, Inc. (250300)  
Knology of the Valley, Inc. (220371)  
Knology Total Communications, Inc. (250295)  
Millry Telephone Company, Inc. (250304)  
Mon-Cre Telephone Cooperative, Inc. (250305)  
Moundville Telephone Company, Inc. (250307)  
National Telephone Company, Inc. (250286)  
New Hope Telephone Cooperative, Inc. (250308)  
Oakman Telephone Company (250311)  
Otelco Telephone, LLC (250312)  
Peoples Telephone Company (250314)  
Pine Belt Telephone Company, Inc. (250315)  
Ragland Telephone Company, Inc. (250316)  
Roanoke Telephone Company, Inc. (250317)  
Union Springs Telephone Company, Inc. (250322)  
Valley Telephone Company, LLC (220324)  
Windstream Alabama, LLC (250302)





FRANCIS B. SEMMES  
General Attorney - AL

AT&T Alabama  
28A2, 600 19<sup>th</sup> Street North  
Birmingham, AL 35203-2210

T: 205-714-0556  
F: 205-323-9204  
M: 205-451-7512  
[fs7093@att.com](mailto:fs7093@att.com)

August 8, 2014



Via Electronic Filing & Overnight Mail

Mr. Walter Thomas, Secretary  
Alabama Public Service Commission  
RSA Union Building, Suite 850  
100 N. Union Street  
Montgomery, AL 36104

**Re: Implementation of Universal Service Requirements of Section 254 of the  
Telecommunications Act of 1996 – Docket No. 25980**

Dear Mr. Thomas:

Enclosed for electronic filing today is BellSouth Telecommunications, LLC d/b/a AT&T Alabama's proposal for the utilization of federal high-cost universal service support for the year 2015. We anticipate that the support level will be approximately \$23.6 million, which will be used for network improvements.

The original and one (1) paper copy will be forwarded to the Commission today via overnight mail. Please distribute as needed and thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Francis B. Semmes".

Francis B. Semmes  
General Attorney – AT&T Alabama

FBS/mhs  
Attachment

cc: Honorable John Garner, Chief ALJ & Executive Director  
Mr. Darrell Baker, Director, Utility Services (via email)  
Mr. David Peeler, Public Utility Analyst Manager

**ALABAMA YEAR 2015 INTERSTATE USF  
FUNDING UTILIZATION  
NETWORK INFRASTRUCTURE INVESTMENTS/IMPROVEMENTS**

**Broadband deployment and maintenance in substantially unserved areas:  
Year 2015 - \$23.6M**

As a result of the FCC's revisions to the USF program in 2011, recipients are required to use all 2015 USF funding to provide broadband in substantially unserved areas. AT&T Alabama will determine the census blocks in our service area which meet these criteria and use these funds to expand and maintain broadband availability in these areas. Examples of the use of these funds include the placement of new IP based equipment, placement of new fiber facilities in the local loop, upgrading inter-office facilities to expand capacity, additional central office based equipment, and other support infrastructure expenditures needed to support this additional broadband deployment.

**CONCLUSION**

These initiatives will provide service improvements in the state by increasing the availability of broadband service and improving the infrastructure that customers in Alabama depend on. Specific projects for 2015 have not yet been identified. While every effort will be made to spend the USF funds as has been identified, some modifications may be necessary as detailed planning and engineering proceeds. All projects funded will meet the FCC's criteria for appropriate use of the funds.

There is a possibility that AT&T Alabama's funding will be reduced as a result of the implementation of the CAF Phase II Order that may affect planned projects. If that should occur, AT&T Alabama will inform the Commission of the reduction and any impact on planned projects if known.



August 8, 2014

**VIA ELECTRONIC FILING AND OVERNIGHT MAIL DELIVERY**

Mr. Walter Thomas, Secretary  
Alabama Public Service Commission  
RSA Union Building, Suite 850  
100 North Union Street  
Montgomery, AL 36104



**RE: Docket No. 25980  
APSC Certification of Eligibility to Receive High Cost Support Pursuant to  
47 C.F.R. §54.314  
2015 Universal Service Plan**

Dear Mr. Thomas:

In conjunction with the Commission's annual certification requirements, please find attached hereto for filing CenturyTel of Alabama, LLC d/b/a CenturyLink ("Company") 2015 Universal Service Plan. The plan is based on the currently estimated \$15 million that the company will receive in frozen federal Connect America Fund ("CAF") (historically high-cost model and interstate access support) support and CAF-ICC (intercarrier compensation support) in 2015 barring any funding changes that may result due to CAF Phase II implementation per FCC 11-161, the Connect America Fund Order.

The original and one copy will be delivered to the Commission. If any additional information is required, please feel free to contact me at (850) 847-0173.

Sincerely,

/s/ Sandra Khazraee  
Sandra Khazraee  
Director of State Regulatory Affairs

Enclosure

SANDRA A. KHAZRAEE  
Director State Regulatory Affairs  
315 S. Calhoun St., Suite 500  
Tallahassee, FL 32031  
Tel: (850) 847-0173  
Fax: (850) 224-0794  
sandy.khazraee@centurylink.com



## **Plan Year 2015**

**\$15.0M**

### **Network operation and improvements -\$ 15.0M**

Network operation and improvements include expenditures and investments such as: enhancing network reliability by placing diverse fiber routes, fiber to existing remotes, adding permanent generators, replacing central office power equipment, replacing select obsolete equipment, placement of next generation technology (digital loop carriers, ethernet, fiber to the premise), replacement of air core and paper insulated cable, adjusting relays, network monitoring, maintaining batteries, repair and replacement of minor materials, restoration of plant damaged by casualties, testing equipment, and vehicle maintenance which enables the company to improve service, continue quality service, and promote availability of advanced services.

Investments and expenses may include extension of fiber, deployment and maintenance of broadband capable equipment, and enabling broadband service in areas substantially unserved by an unsubsidized carrier.

### **Conclusion**

Per DA 13-2101 released October 30, 2013, the Federal Communications Commission clarified that the 47 C.F.R. 54.313(c) and 47 C.F.R. 54.313(d) broadband spending obligations applied to carriers at a holding company level. Therefore, as long as the total amount of support received by a carrier is utilized in its study area, the obligation to deploy, operate, or maintain a broadband capable network in areas substantially unserved by an unsubsidized carrier can be fulfilled at the holding company level.

All frozen Connect America Fund ('CAF') monies received by CenturyTel of Alabama d/b/a CenturyLink will be used in its study area for the provision, maintenance, and upgrading of facilities and services for which the support is intended. In addition, all 2015 frozen CAF monies received by CenturyLink, Inc., the holding company for CenturyTel of Alabama, will support broadband deployment and operation of broadband-capable networks in areas substantially unserved by an unsubsidized competitor.

In 2015, CenturyTel of Alabama, LLC d/b/a CenturyLink will continue upgrading any obsolete facilities, as necessary, to meet evolving service requirements and maintain high quality service as well as continue to expand its facilities, as needed, in order to serve new homes, subdivisions, and the business community within its eligible telecommunications carrier service area. Also, CenturyTel of Alabama, LLC d/b/a CenturyLink will continue to maintain, replace, and/or upgrade facilities and equipment on an "as needed" basis to ensure that customers continue to have access to enhanced services, including broadband.

This is intended to be a preliminary plan, as such; any significant deviations will be identified and reported, as necessary, in quarterly tracking reports.

The plan expenditures above are subject to change due to company considerations and timing of CAF Phase II implementation.



A Telecommunications Company

April 22, 2014

Secretary  
Alabama Public Service Commission  
P. O. Box 304260  
100 North Union Street, Suite 850  
Montgomery, Alabama 36130



Re: Annual USF Certification Filing – Docket No. 25980, December 12, 2013 Order

Electronic Filing

Dear Secretary,

Attached is the 2014 Annual USF Certification filing for the Ardmore Telephone Company, Inc. Tennessee Study Area 290280. These funds are used exclusively for network and service enhancements voice telephony services.

If you have any questions please contact me at the phone number or email address listed below.

Sincerely,

A handwritten signature in cursive script that reads "Martin Clift".

Martin Clift  
Regulatory Manager  
270-674-1000  
mclift@wk.net



FCC CC Docket No. 96-45  
Section 254(e), 47 C.F.R. § 54.314

Certification of  
Ardmore Telephone Company, Inc.

AFFIDAVIT

I, Trevor R. Bonnstetter, CEO of the Ardmore Telephone Company, Inc. hereby certify under penalties of perjury that:

1. My name is Trevor R. Bonnstetter. I am employed by Ardmore Telephone Company, Inc. in the position of Chief Executive Officer (CEO). In this position, I am personally familiar with the Federal Universal Service support received by the Company and how the Company uses these funds.
2. Ardmore Telephone Company (AL-Study Area 290280) has been designated as an (ETC) eligible telecommunications carrier by the Alabama Public Service Commission.
3. The Company is a "rural telephone company" as defined in 47 U.S.C. §153(37);
4. Ardmore Telephone Company, Inc. estimates receiving approximately \$550 thousand in Federal Universal Service high-cost support during January 1, 2015 to December 31, 2015 time period. All Federal high-cost Universal Service support provided to the Cooperative was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, as designated by the Federal Communications Commission consistent with Section 254 (e) of the Federal Telecommunications Act. These funds will be used to provide the supported service – voice telephony service as outlined in 47CFR 54.101 (a), which are available to any customer in the Cooperative's service area. This supported service includes: voice grade access to the public switched network; minutes of use for local service provided at no additional charge; access to emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in the Cooperative's service area has implemented 911 or enhanced 911 systems.
5. Ardmore Telephone Company follows Federal Communications Commission Part 32 accounting requirements for regulated local exchange carriers and Part 36 separations provisions used to determine high cost support amounts. As a regulated utility, Ardmore Telephone Company's accounting and separations procedures are subject to periodic National Exchange Carrier Association and Alabama Public Service Commission reviews.
6. While continuing to receive amounts of Federal Universal Service support as described and using this support for the purpose as described, Ardmore Telephone Company does not anticipate increasing local rates nor withdrawing any services; therefore, the comparability of rates and service between the rural areas served by Ardmore Telephone Company will not be changed because of any action on part of Ardmore Telephone Company.

The matters addressed above are within my personal knowledge and are true and correct.

Signature:  Date: April 22, 2014  
Print Name: Trevor R. Bonnstetter


Title: CEO

State of Kentucky, County of Graves

BEFORE ME, the undersigned Notary in and for the State of Kentucky,  
on this day personally appeared Trevor R. Bonnstetter, known to me to be the  
Declarant, who, being duly sworn, executed the foregoing instrument.

Subscribed and sworn to before me this 22th day of April 2014.

My Commission expires 04-14-18.

  
Notary Public #50668K

(seal)



Otelco Inc, 505 3<sup>rd</sup> Ave E, Oneonta, AL 35121 Phone: 205 625-3591

April 6, 2014



**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Blountsville Telephone LLC's Certification of Eligibility to Receive High Cost  
Support for 2015 Pursuant to 47 C.F.R. § 54.314;  
APSC Docket 25980**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached hereto for electronic filing Blountsville Telephone LLC's certification that it is eligible to continue to receive federal high-cost universal service support for the year 2015, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314 and APSC Docket No. 25980. The original and one copy will be delivered to the Commission. If any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

Dennis Andrews  
Senior Vice President

Enclosure



## CERTIFICATION


In its December 20, 2001 and September 28, 2010 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and for each of the "rural LEC Average Schedule Companies" to file a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review. Pursuant to said Orders, Blountsville Telephone LLC (the "Company") has previously provided the Commission with a copy of its most recent annual interstate cost separation study, annual 2014 USF-HCLS and estimated 2014 USF-LSS filings.

The Company further certifies that all federal high-cost support provided to the Company was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

The Company respectfully requests that the Commission notify the Federal Communications Commission prior to October 1 of this year that the Company is eligible to receive federal high-cost support in 2015. Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to Dennis Andrews at (256) 586-1420.

Respectfully Submitted,

BLOUNTSVILLE TELEPHONE LLC

By:   
Dennis Andrews  
As Its: Senior Vice President

Date: 4-6-2014



Otelco Inc, 505 3<sup>rd</sup> Ave E, Oneonta, AL 35121 Phone: 205 625-3591

April 6, 2014



**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Brindlee Mountain Telephone LLC's Certification of Eligibility to Receive High Cost Support for 2015 Pursuant to 47 C.F.R. § 54.314; APSC Docket 25980**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached hereto for electronic filing Brindlee Mountain Telephone LLC's certification that it is eligible to continue to receive federal high-cost universal service support for the year 2015, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314 and APSC Docket No. 25980. The original and one copy will be delivered to the Commission. If any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

Dennis Andrews  
Senior Vice President

Enclosure

## CERTIFICATION

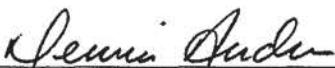
In its December 20, 2001 and September 28, 2010 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and for each of the "rural LEC Average Schedule Companies" to file a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review. Pursuant to said Orders, Brindlee Mountain Telephone LLC (the "Company") has previously provided the Commission with a copy of NECA's proposed annual 2014 USF-HCLS and 2014 USF-LSS amounts.

The Company further certifies that all federal high-cost support provided to the Company was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

The Company respectfully requests that the Commission notify the Federal Communications Commission prior to October 1 of this year that the Company is eligible to receive federal high-cost support in 2015. Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to Dennis Andrews at (256) 586-1420.

Respectfully Submitted,

BRINDLEE MOUNTAIN TELEPHONE  
LLC

By:   
Dennis Andrews  
As Its: Senior Vice President

Date: 4-6-2014





525 Junction Rd  
Madison, WI 53717  
www.tdstelecom.com

May 1, 2014

**CONFIDENTIAL**

**VIA OVERNIGHT DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104



**RE: APSC Certification of Eligibility to Receive High Cost Support  
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980.**

Dear Mr. Thomas:

In conjunction with the Commissioner's annual certification requirements, please find enclosed for electronic filing Butler Telephone Company, Inc., Oakman Telephone Company and Peoples Telephone Company d/b/a TDS Telecom's (the "Companies") certification that the Companies are eligible to continue to receive federal high cost support for high-cost universal service support for the year 2015, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314 and APSC Docket No. 25980. The original and ten (10) copies have been enclosed.

If additional information is required, please contact me at 865-671-4749.

Very truly yours,

James C. Meade  
Manager – State Government Affairs

Enclosure

cc: David Peeler

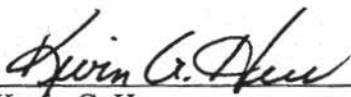
## CERTIFICATION

In its December 20, 2001 and December 12, 2013 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and each of the "rural LEC Average Schedule Companies" to file with the Commission a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review. Pursuant to said Orders, Butler Telephone Company, Inc., Oakman Telephone Company and Peoples Telephone Company d/b/a TDS Telecom's (the "Companies") have previously provided the Commission with a copy of their most recent annual interstate cost separation study, annual 2014 USF-HCLS, and estimated 2014 USF-LSS filings. Oakman Telephone Company, Inc., has previously provided a copy of NECA's proposed annual 2014 USF-HCLS and 2014 USF-LSS amounts.

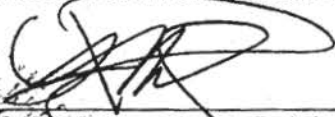
The Companies further certify that all federal high-cost support provided to the Companies was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

The Companies respectfully request that the Commission notify the Federal Communications Commission prior to October 1 of this year that the Companies are eligible to receive federal high-cost support in 2015. Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to Jim Meade at 865-671-4749.

Respectfully Submitted,

  
\_\_\_\_\_  
Kevin G. Hess  
Senior Vice President  
Government & Regulatory Affairs

Subscribed and sworn to before me this first day of May, 2014.

  
\_\_\_\_\_  
Kristin M. Statz - Notary Public  
My Commission expires May 24, 2015.  
Date: May 1, 2014